

INDEPENDENT
COSMETIC
MANUFACTURERS
AND
DISTRIBUTORS, INC.

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October 7, 1999

Dockets Management Branch (HFA-305)
Food and Drug Administration
5630 Fishers Lane, Room 1061
Rockville, MD 20852

**RE: [Docket No. 99N-0389]
Draft Affirmative Agenda for International Activities**

In response to a *Federal Register* Notice on September 17, 1999, the Independent Cosmetic Manufacturers & Distributors (ICMAD) would like to submit its comments regarding V. International Trade Agreements and other Trade-Related Activities.

On the matter of FDA's issuing Certificates for Export (formerly Certificates of Free Sale) and providing alternative mechanisms for such certificates, ICMAD would like to comment that it is strongly in favor of such alternative mechanisms continuing to have FDA approval.

The association initiated a program for the issuance of Certificates of Free Sale in 1991. Since then, more than 1200 have been issued to our members with countries ranging from Argentina to Yugoslavia. This service was in response to our members asking their trade association to perform such a service since our turnaround time is considerably less than going through a government agency. CFSAN's Office of Cosmetics and Colors has stated that it has no objection to cosmetic trade associations, such as ICMAD and CTFA (Cosmetic Toiletry and Fragrance Association) providing Certificates of Free Sale on behalf of their members.

Thus, ICMAD strongly encourages CFSAN to list trade associations such as ICMAD and CTFA as alternative mechanisms for issuing the newly renamed Certificates for Export under Attesting to the Safety or Other Attributes of Foods and Cosmetics Produced in the U.S.

Respectfully submitted,

Penni Jones, Executive Director

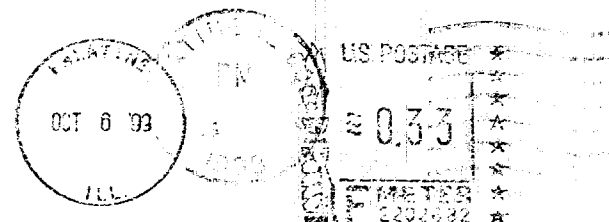
cc: Howard Baker, Chair, ICMAD Technical/Regulatory Compliance Committee
Robert Barash, ICMAD President
Rachel Gertzog, Chair of ICMAD International Committee

99N-3089

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